

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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LISA DOLAN COYLE	:	
3120 Maureen Drive	:	
Philadelphia, PA 19154	:	
	:	
Plaintiff,	:	JURY TRIAL DEMANDED
v.	:	
	:	
AMERCO, t/a Republic Western Insurance Company	:	
1 Ivybrook Boulevard Suite 160	:	
Ivyland, PA 18974	:	
	:	
	:	
JAMES WALLETE,	:	
	:	
Defendants	:	Civil Action No. 02-CV-3619
	:	

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**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION IN  
LIMINE TO PRECLUDE EVIDENCE REGARDING ALLEGED INCIDENTS OF  
RACIAL DISCRIMINATION**

Defendants seek to preclude introduction of evidence of incidents of racial discrimination at Republic Western. These incidents are relevant and admissible to evaluating the “totality of the circumstances”, and to rebutting defendants’ claim of the existence of a well-developed and enforced anti-harassment policy.

**Evidence of the Defendant’s Treatment of Members of Other Protected Classes Is Admissible**

This circuit has specifically found that evidence of discrimination against members of other protected classes is admissible to support a plaintiff’s claim of discrimination against him:

Circumstantial evidence of discrimination includes evidence ‘that the employer in